

# COMPLAINT

(for non-prisoner filers without lawyers)

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## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

Christopher Bell

v.

Case Number:

**22-c-0005**

(Full name of defendant(s))

Tesla Motors, Inc

(to be supplied by Clerk of Court)

### A. PARTIES

1. Plaintiff is a <sup>consumer</sup>~~citizen~~ of Wisconsin and resides at  
(State)

8614 West Hemlock Street  
(Address)  
Abode

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Tesla Motors, Inc  
(Name)

is (if a person or private corporation) a citizen of California (State, if known)  
and (if a person) resides at 3500 Deer Creek Rd, Palo Alto, CA, 94304 (Address, if known)  
and (if the defendant harmed you while doing the defendant's job)  
worked for \_\_\_\_\_ (Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

See next page

## B. STATEMENT OF CLAIM

On December 3, 2021, the plaintiff, Christopher Ball, engaged in a consumer credit transaction with the defendant, Tesla Motors, Inc for a vehicle. Ball chose the Tesla Model Y and paid a \$250 reservation fee. Ball received an order agreement from Tesla Motors for the vehicle. Ball applied for financing under a credit plan for which the plaintiff's social security card (credit card under 15 USC §1602(l)) was charged electronically through a fraudulent loan application. The application was processed by Tesla Motors, US Bank, TD Auto Finance, JPMorgan Chase, Wells Fargo, BMO Harris Bank, Alliant Credit Union and Technology Credit Union. Ball was denied his right to credit due to "a low FICO score and delinquencies" on the plaintiff's credit file. This unfair action placed 5 different inquiries on the credit file of Ball. Under 12 USC §1431, neither Tesla Motors nor the aforementioned banks have the power to extend credit which makes the credit application provided by the defendant deceptive and fraudulent. Ball has suffered humiliation and depression due to the unfair actions of Tesla Motors. Ball is seeking remedy and damages for the unfair actions of Tesla Motors, Inc which are in violation of the following laws:

15 USC §1605

15 USC §1632

15 USC §1635

15 USC §1644(d)

15 USC §77q(a)(3)

15 USC §1681q

15 USC §6821(a)(2)

18 USC §1028(a)(7)

18 USC §1028A

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ \_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

See next page

D. RELIEF WANTED

Ball would like the court to award the Tesla Model Y that was purchased and the following fines:

**Violation of 15 USC §1605:** \$5,000 pursuant to 15 USC §1611

**Violation of 15 USC §1632 and 15 USC §1635:** Double the newly calculated finance charge (to include car insurance of the plaintiff's discretion and any other fees incurred that are in accordance with 15 USC §1605), \$5,000 for §1632 and \$5,000 for §1635 pursuant to 15 USC §1640(2)(A)(iii)

**Violation of 15 USC §1644(d):** \$10,000 pursuant to 15 USC §1644

**Violation of 15 USC §77q(a)(3):** \$10,000 pursuant to 15 USC §77x

**Violation of 15 USC §1681q:** Fine under title 18

**Violation of 15 USC §6821:** Pursuant to 15 USC §6823(a) this unfair action should be fined under title 18.

**Violation of 18 USC §1028(a)(7), 18 USC §1028A, 15 USC §1681q and 15 USC §6821:** these unfair actions should be viewed as felonies for which a \$500,000 fine should be assessed per action equaling \$2,000,000 pursuant to 18 USC §3571(c)(3).

E. JURY DEMAND

I want a jury to hear my case.


☐ - YES

☒ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 30 day of December 2021.

Respectfully Submitted,

  
Signature of Plaintiff

(414) 405-0956  
Plaintiff's Telephone Number

christopheroball@yahoo.com  
Plaintiff's Email Address

8619 West Hemlock Street

Milwaukee, WI 53224  
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE**

☒

I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Filing Fee form and have attached it to the complaint.

☐

I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.